

UNITED STATES DISTRICT COURT FOR TENNESSEE
MIDDLE DIVISION

Timothy L. Jefferson, a.k.a.,
Sharaf Abdullah al-Sadiq-
JEFFERSON,
PROSE-plaintiff,

V.

CORE Civic,

Private Prison Officials,
Defendants),

Case No.

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JUL 05 2023

U.S. District Court
Middle District of TN

MOTION FOR A TEMPORARY RESTRAINING ORDER
AND A PRELIMINARY INJUNCTION

Respectfully and May it Please the Court ...

Comes Now, Timothy L. Jefferson, the
above mentioned, PROSE-plaintiff, before this
Honorable United States District Court, and
PURSUANT to Rule 65, Fed. R. Civ. P., MOVES

for a Temporary Restraining Order and a Preliminary Injunction.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the following is both true and correct:

1. I am the PRASE Plaintiff in this case, and I urgently make this declaration in support of my Motion for a Temporary Restraining Order and a Preliminary Injunction, to ensure that: (a) I am transferred and/or properly isolated in segregation to be protected from assault by other inmates and from unreasonably hazardous living conditions at TTCC; (b) at TTCC, I am furnished sanitation materials to clean my cell where exposed to an unreasonable risk of disease in segregation; (c) I am furnished at least one hour of suitable exercise in the open air daily; (d) that I am protected from the barbaric, dehumanizing, and degrading inhuman unwritten policy and practice of being forced to share a shower with my cell-mates; (e) I am provided an alternate entrée for each meal, but fish;

2. As set-forth in the ANNEXED exhibits, i. e., 5-1C, AND GRIEVANCE that back-up that I am in the process of fulfilling the exhaustion REQUIREMENT, I requested Protective Custody ON APRIL 23, 2023, and ON SAID day, I was isolated and taken to the segregation unit;

3. It is needless that I note that, I have been housed at TTCC SINCE APRIL of 2016, SINCE after it opened in 2016, and CORE CIVIC's TTCC facility, even to the present date, there has been a long-standing lack of staffing and overcrowding problems that have worked to force me to witness TTCC result in a progressively more violent atmosphere where terror reign, and occur with sufficient frequency in every unit, including in the segregation unit;

4. In turn, at TTCC, there is a deficient failure of protective custody to actually provide safety, and there are obstacles to admission to protective custody, by officials' failure to follow their own rules, regulations, or policies concerning protection of prisoners;

5. While in segregation, on behalf, the cell J

CURRENTLY RESIDE IN, WAS NOT ALREADY CHART, AND I WAS NEVER FURNISHED WITH MATERIALS TO KEEP MY CELL CHART;

6. While in segregation, I have been isolated but subjected to solitary confinement for 24 HOURS A DAY, WITHOUT AT LEAST ONE HOUR OF SUITABLE EXERCISE IN THE OPEN AIR DAILY;

7. While in segregation, ON APRIL 29, 2023, I WAS AMBUSHED BY A DISCOVERY THAT 'TTCC' ARE IMPLEMENTING AN UNWRITTEN POLICY AND PRACTICE THAT IS BARBARIC, DEHUMANIZING, AND IT IS OF A BESTIAL NATURE, AND DEGRADINGLY INDECENT, BECAUSE, OFFICIALS AT TTCC, ARE FORCING CELL-MATES TO SHOWER TOGETHER, IN THE SAME SHOWER WITHIN FEET APART, WHILE UNSUPERVISED, AND LOCKED-IN A CAGED BOX;

8. While in segregation, although I have complied in every respect with TTCC'S RULES, REGULATIONS, OR POLICIES TO REQUEST AN ALTERNATE ENTRANCE FOR RELIGIOUS REASONS, MY FREEDOM TO PRACTICE MY RELIGION, NONETHELESS, HAS STILL BEEN SUBSTANTIALLY BURDENED

in this regard;

9. Together, these Defendants have the responsibility for providing the Prose-plaintiff: (a.) protection from assault by other inmates, i.e., provide protective custody that actually provides safety, by following its own rules, regulations and policies concerning protection of prisoners, without obstacles to admission to protective custody; (b.) materials to keep his cell clean in segregation; (c.) at least one (1) hour of recreation in open air daily; (d.) exempted from showering with any cell-mates; (e.) an alternate entrance for each meal, but fish;

10. For the reasons set forth in the memorandum of law filed with this motion, the Prose-plaintiff is entitled to a Temporary Restraining Order and a Preliminary Injunction, requiring the Defendants to arrange for fulfillment, in every respect, of his responsibilities for providing the Prose-plaintiff as outlined in # 9 above of this Motion, to correct

the continuing deprivation of his federal
Constitutional Rights that constitutes irreparable
harm;

ii. for the foregoing reasons, this Honorable,
United States District Court should grant PROSE-
Plaintiff's motion in all respects,
IT IS SO PRAYED!

PURSUANT to 28 U.S.C. § 1746,
I declare under penalty of perjury that the
foregoing is true and correct.

Dated: May 2nd, 2023

Timothy L. Jefferson # 337014

TTCC

140 MAON Way

Hartsville, TN, 37074

INCIDENT STATEMENT

Facility	Incident Number
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Incident Date	Incident Time (HRS)
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Person Name	ID Number (Employee #/Inmate #/Civilian ID)	Person Type (Employee/Inmate/Civilian)	Person Role (Witness or Participant)
Timothy Jackson	337014		

Housing Location (For Inmates/Residents Only)

Based on your own knowledge, what did you see, hear, and do?
<p>In 2011 I agreed to join an affiliation that I have left-ARROW in my near 24 years incarcerated. I now chose to be Muslim and the affiliation felt I committed treason because I put God before them to save my soul. Now the affiliation tells me to get off the compound so I feel my life is in jeopardy and I'm asking to be protected by placement in protective custody and immediate transfer far from this institution because I don't feel safe anywhere on this compound.</p>

Did you receive any injuries? YES or NO (If YES, Explain Below)

Were you evaluated by medical? YES or NO
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Printed Name:	Timothy Jackson	Date:	4-23-23
Signature:		Date:	
Typed By:		Date:	

This section to be completed by CoreCivic staff if the civilian/other or inmate/resident refused to complete the 5-1C.

Place an "X" in the appropriate box:

Inmate/Resident refused to complete this 5-1C
Civilian/Other refused to complete this 5-1C

Employee/Witness Printed Name	Date:
Employee/Witness Signature	

Employee/Witness Printed Name	Date:
Employee/Witness Signature	

CA-10
"Back" Jackson
Morgan
Zick
(2/11/21)

Clothing and bedding

Rule 19

1. Every prisoner who is not allowed to wear his or her own clothing shall be provided with an outfit of clothing suitable for the climate and adequate to keep him or her in good health. Such clothing shall in no manner be degrading or humiliating.
2. All clothing shall be clean and kept in proper condition. Underclothing shall be changed and washed as often as necessary for the maintenance of hygiene.
3. In exceptional circumstances, whenever a prisoner is removed outside the prison for an authorized purpose, he or she shall be allowed to wear his or her own clothing or other inconspicuous clothing.

Rule 20

If prisoners are allowed to wear their own clothing, arrangements shall be made on their admission to the prison to ensure that it shall be clean and fit for use.

Rule 21

Every prisoner shall, in accordance with local or national standards, be provided with a separate bed and with separate and sufficient bedding which shall be clean when issued, kept in good order and changed often enough to ensure its cleanliness.

Food

Rule 22

1. Every prisoner shall be provided by the prison administration at the usual hours with food of nutritional value adequate for health and strength, of wholesome quality and well prepared and served.
2. Drinking water shall be available to every prisoner whenever he or she needs it.

Exercise and sport

Rule 23

1. Every prisoner who is not employed in outdoor work shall have at least one hour of suitable exercise in the open air daily if the weather permits.

2. Young prisoners, and others of suitable age and physique, shall receive physical and recreational training during the period of exercise. To this end, space, installations and equipment should be provided.

Health-care services

Rule 24

1. The provision of health care for prisoners is a State responsibility. Prisoners should enjoy the same standards of health care that are available in the community, and should have access to necessary health-care services free of charge without discrimination on the grounds of their legal status.
2. Health-care services should be organized in close relationship to the general public health administration and in a way that ensures continuity of treatment and care, including for HIV, tuberculosis and other infectious diseases, as well as for drug dependence.

Rule 25

1. Every prison shall have in place a health-care service tasked with evaluating, promoting, protecting and improving the physical and mental health of prisoners, paying particular attention to prisoners with special health-care needs or with health issues that hamper their rehabilitation.
2. The health-care service shall consist of an interdisciplinary team with sufficient qualified personnel acting in full clinical independence and shall encompass sufficient expertise in psychology and psychiatry. The services of a qualified dentist shall be available to every prisoner.

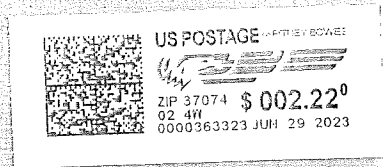
Rule 26

1. The health-care service shall prepare and maintain accurate, up-to-date and confidential individual medical files on all prisoners, and all prisoners should be granted access to their files upon request. A prisoner may appoint a third party to access his or her medical file.
2. Medical files shall be transferred to the health-care service of the receiving institution upon transfer of a prisoner and shall be subject to medical confidentiality.

Rule 27

1. All prisons shall ensure prompt access to medical attention in urgent cases. Prisoners who require specialized treatment or surgery shall be transferred to specialized institutions or to civil hospitals. Where a prison service has its own hospital facilities, they shall be adequately staffed and

Timothy L. Jefferson #33704



TTCC

140 MAISON WAY

Hartsville, TN, 37074

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DEPARTMENT OF CORRECTION
ICC HAS NEITHER INSPECTED
NOR CENSORED AND IS NOT
RESPONSIBLE FOR THE CONTENTS

TENNESSEE MIDDLE
UNITED STATES COURTHOUSE
801 BROADWAY,
Nashville, TN, 37203-3816

[PROCESSED-LEGAL-MAL]

